

# EXHIBIT G

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

IN RE NATIONAL PRESCRIPTION  
OPIATE LITIGATION

This document relates to:

*Track One Cases*

MDL No. 2804

Case No. 17-md-2804

Judge Dan Aaron Polster

**AMERISOURCEBERGEN DRUG CORPORATION'S  
SUPPLEMENTAL OBJECTIONS AND RESPONSES TO PLAINTIFFS'  
COMBINED DISCOVERY REQUESTS**

Pursuant to the Court's Order dated November 21, 2018, AmerisourceBergen Drug Corporation (ABDC) re-asserts and supplements its responses to Plaintiffs' Combined Discovery Requests.

Contrary to representations made by the Plaintiffs Executive Committee (PEC) at the hearing before the Court on November 20, 2018, ABDC already provided substantive responses to Plaintiffs' (First) Combined Discovery Requests on July 31, 2018. Pursuant to the direction of Special Master Cohen, ABDC's responses identified documents produced by ABDC that contain responsive information. At no time prior to the November 20, 2018 hearing did the PEC, or ABDC's assigned discovery handlers, contend that ABDC's responses to Plaintiffs' Combined Discovery Requests were deficient.

The PEC's suggestion that ABDC has not produced information relating to its Suspicious Order Monitoring System (SOMS) is simply wrong. As set forth below, ABDC has produced a significant amount of detailed information relating to its SOMS; that previously-produced information is directly responsive to the below requests. *See* ABDC Production Log attached hereto. Notably, on June 1, 2018, ABDC produced a twenty-five page Memorandum (Bates

Nos. ABDCMDL00004578-4602) that described in detail the operations and functionality of both ABDC's Legacy (Past) Diversion Control Program (2007-2014) and Current Diversion Control Program (2014 to the present). This Memorandum – which Plaintiffs have possessed for almost *six months* – provides a narrative description, along with 502 pages of corresponding exhibits, reflecting, among other things, ABDC's Policies and Procedures, Training and Education, New Customer Due Diligence, Order Monitoring Program, Resource and Oversight, Ongoing Monitoring and External Review that were associated with both the Legacy and Current Diversion Control Programs. *See* ABDCMDL00004603-5104.

In addition, ABDC has searched for, identified and already produced to Plaintiffs documents relating to ABDC's SOMS in effect from approximately 1998 to 2007, including, but not limited to, communications with the DEA in which DEA grants approval for that 1998 system. *See* ABDCMDL00269347-269358.

Finally, ABDC has made available (and continues to make available) its employees (current and former) from the Corporate Securities and Regulatory Affairs Department who are (or were) responsible for ABDC's diversion control programs:

| <b>Name</b>     | <b>Title</b>   | <b>Deposition Date</b> |
|-----------------|--|------------------------|
| Chris Zimmerman | Senior Vice President of Corporate Security & Regulatory Affairs and Chief Compliance Officer (formerly Vice President of Corporate Security & Regulatory Affairs) | August 4, 2018         |
| David May       | Vice President of Diversion Control & Security (formerly Senior Director, Diversion Control & Federal Investigations)  | August 3, 2018         |
| Steve Mays      | Senior Director, Corporate Security & Regulatory Affairs   | October 24, 2018       |

| <b>Name</b>      | <b>Title</b>  | <b>Deposition Date</b>           |
|------------------|---|----------------------------------|
| Edward Hazewski  | Director of Diversion Control & Security (formerly Manager of the Diversion Control Program (2008-2016) and Director Security Systems & Services (2016-2018)) | October 25, 2018                 |
| Bruce Gundy      | Director of Investigations & Security   | November 7, 2018                 |
| Eric Cherveney   | Director of Diversion Control & Security  | November 9, 2018                 |
| Sharon Hartman   | Director of Pharmacy Compliance & Diversion Control   | November 29, 2018                |
| Kevin Kreutzer   | Diversion Control Investigator  | November 27, 2018                |
| Nikki Seckinger  | Diversion Control Investigator  | December 12, 2018<br>(confirmed) |
| Elizabeth Garcia | Diversion Control Investigator<br>(former)  | December 14, 2018<br>(confirmed) |

Plaintiffs have deposed (or will depose) these witnesses and have obtained hours of testimony from these witnesses concerning the functionality of ABDC's diversion control programs. In particular, Chris Zimmerman and David May, who were deposed as both fact and 30(b)(6) witnesses, were designated and deposed as corporate witnesses on a wide range of topics relating to ABDC's SOMS for the period of 2006 to 2018. Thus, there is absolutely no basis for PEC's suggestion to the Court that ABDC has not already provided information about its diversion control programs.

In addition to the above, ABDC supplements its responses to Nos. 2-7 of Plaintiffs' Combined Discovery Requests as follows.

## **OBJECTIONS AND RESPONSES**

ABDC incorporates herein by reference its General Objections, Objections to Definitions and Instructions, and Reservation of Rights as set forth in its Objections and Responses to Plaintiffs' Combined Discovery Requests.

## **COMBINED DISCOVERY REQUESTS**

**Request No. 2.** Please produce each of your *Suspicious Order Monitoring System (SOMS)* policies and procedures since January 1, 2006 and identify the Bates stamp range for each; please identify the effective date(s) each was in force and effect.

### **RESPONSE:**

ABDC incorporates herein by reference its General Objections and Objections to Definitions and Instructions as set forth in its Objections and Responses to Plaintiffs' Combined Discovery Requests.

Subject to and without waiving its objections, to the extent that it possesses such information, ABDC has produced its Order Monitoring Program policies and procedures in effect during the period from January 1, 2006 to May 29, 2018 at ABDCMDL00000011-ABDCMDL00000190; ABDCMDL00002169-ABDCMDL00002231; ABDCMDL00002261-ABDCMDL00002440; ABDCMDL00002642-ABDCMDL00002704; ABDCMDL00002713-ABDCMDL00002785; ABDCMDL00003039-ABDCMDL00003087; ABDCMDL00003089-ABDCMDL00003115; ABDCMDL00003117-ABDCMDL00003135; ABDCMDL00003220-ABDCMDL00003355; ABDCMDL00003367-ABDCMDL00003502; ABDCMDL00003686-ABDCMDL00003746; ABDCMDL00003949-ABDCMDL00004095; ABDCMDL00004264-ABDCMDL00004326; ABDCMDL00004481-ABDCMDL00004553; ABDCMDL00017004-ABDCMDL00017085; ABDCMDL00035379-ABDCMDL00035408; ABDCMDL00035418-

ABDCMDL00035430; ABDCMDL00035445-ABDCMDL00035461; ABDCMDL00035500-ABDCMDL00035529; ABDCMDL00035535-ABDCMDL00035537; ABDCMDL00035707-ABDCMDL00035709; ABDCMDL00037316-ABDCMDL00037400; ABDCMDL00169890-ABDCMDL00170123; ABDCMDL00172093-ABDCMDL00172134; ABDCMDL00355517-ABDCMDL00355598; ABDCMDL00355611-ABDCMDL00355620; ABDCMDL00359842-ABDCMDL00360025; ABDCMDL00360029-ABDCMDL00360034; ABDCMDL00360182-ABDCMDL00360193; ABDCMDL00360208-ABDCMDL00360228; ABDCMDL00360276-ABDCMDL00360313; ABDCMDL00364267-ABDCMDL00364390.<sup>1</sup>

**Request No. 3.** Please identify and describe each *suspicious order* your Suspicious Order Monitoring System (SOMS) identified since January 1, 2006 and produce all documents related thereto; please identify the Bates stamp range for each related to *Case Track One*.

**RESPONSE:**

ABDC incorporates herein by reference its General Objections and Objections to Definitions and Instructions as set forth in its Objections and Responses to Plaintiffs' Combined Discovery Requests. ABDC further objects to this Combined Request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of information or documents relevant to any claim or defense in this action to the extent that it is not limited to ABDC's distribution of Opioids to Cuyahoga or Summit Counties in Ohio, or, more specifically, ABDC's distribution of Opioids to pharmacies or healthcare providers in Summit or Cuyahoga Counties in Ohio that are alleged to have actually diverted Opioids resulting in purported harm to Plaintiffs. ABDC further objects to this Combined Request to the extent it implies that an order flagged by ABDC's Order Monitoring Program is a "suspicious order." To the contrary, once an

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<sup>1</sup> In addition to the above-listed documents, responsive documents found within custodial files have also been produced.

order is flagged by ABDC's Order Monitoring Program for further review, it is further reviewed to determine whether it is "suspicious."

Subject to and without waiving its objections, to the extent that it possesses such information, ABDC has produced Documents sufficient to identify orders flagged by ABDC's Order Monitoring Program for further review, as well as orders that were determined to be suspicious and reported to the DEA, from July 1, 2007 to May 29, 2018, relating to its distribution and sale of Opioids in Cuyahoga or Summit Counties in Ohio at ABDCMDL00279836-ABDCMDL00279838 (2012-2018: Cuyahoga County, Summit County, City of Cleveland); ABDCMDL00279840-ABDCMDL00279841 (2007-2012: Summit County); ABDCMDL00279843-ABDCMDL00279844 (2007-2012: Cuyahoga County); ABDCMDL00279846-ABDCMDL00279847 (2007-2012: City of Cleveland); ABDCMDL00308068-ABDCMDL00308070 (2007-2012: Cuyahoga County, Summit County, City of Cleveland); ABDCMDL00355865 (April 2018-May 2018: Cuyahoga County, Summit County, City of Cleveland). After a reasonable investigation, ABDC has not located documents that reflect the suspicious orders it reported to the DEA prior to July 1, 2007.

**Request No. 4.** Please identify each suspicious order you *reported* to the DEA since January 1, 1996 and produce all documents related thereto; please identify the Bates stamp range for each related to *Case Track One*.

**RESPONSE:**

ABDC incorporates herein by reference its General Objections and Objections to Definitions and Instructions as set forth in its Objections and Responses to Plaintiffs' Combined Discovery Requests. ABDC further objects to this Request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of information or documents relevant to

any claim or defense in this action to the extent that it is not limited to ABDC's distribution of Opioids to Cuyahoga or Summit Counties in Ohio, or, more specifically, ABDC's distribution of Opioids to pharmacies or healthcare providers in Summit or Cuyahoga Counties in Ohio that are alleged to have actually diverted Opioids resulting in purported harm to Plaintiffs.

Subject to and without waiving its objections, to the extent that it possesses such information or that such information can be retrieved without unreasonable burden, for the period from July 1, 2007 to May 29, 2018, ABDC has produced Documents sufficient to identify suspicious orders reported to the DEA relating to its distribution and sale of Opioids in Cuyahoga or Summit Counties in Ohio at ABDCMDL00279836-ABDCMDL00279838 (2012-2018: Cuyahoga County, Summit County, City of Cleveland); ABDCMDL00279841 (2007-2012: Summit County); ABDCMDL00279844 (2007-2012: Cuyahoga County); ABDCMDL00279847 (2007-2012: City of Cleveland); ABDCMDL00355865 (April 2018-May 2018: Cuyahoga County, Summit County, City of Cleveland). In addition to the above-listed documents, responsive documents can be found within ABDC's productions of the CSRA Share Drive, LawTrac, Matter Management System, Tableau files, and custodial files. After a reasonable investigation, ABDC has not located documents that reflect the suspicious orders it reported to DEA prior to July 1, 2007.

**Request No. 5.** For each suspicious order you identified but did not report to the DEA since January 1, 2006, please describe in as much detail as possible the reasons and produce all documents related thereto; please identify the Bates stamp range for each related to *Case Track One*.

**RESPONSE:**

ABDC incorporates herein by reference its General Objections and Objections to Definitions and Instructions as set forth in its Objections and Responses to Plaintiffs' Combined



Discovery Requests. ABDC further objects to this Request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of information or documents relevant to any claim or defense in this action to the extent that it is not limited to ABDC's distribution of Opioids to Cuyahoga or Summit Counties in Ohio, or, more specifically, ABDC's distribution of Opioids to pharmacies or healthcare providers in Summit or Cuyahoga Counties in Ohio that are alleged to have actually diverted Opioids resulting in purported harm to Plaintiffs. ABDC further objects to this Combined Request to the extent it implies that an order flagged by ABDC's Order Monitoring Program is a "suspicious order." To the contrary, once an order is flagged by ABDC's Order Monitoring Program for further review, it is further reviewed to determine whether it is "suspicious."

Subject to and without waiving its objections, ABDC states that it reports all orders determined to be suspicious to the DEA, and that after reasonable investigation, it is not aware of any orders identified as suspicious that were not reported to DEA. By way of further response, ABDC has produced Documents sufficient to identify the action taken for orders flagged by ABDC's Order Monitoring Program for further review from July 1, 2007 to May 29, 2018, relating to its distribution and sale of Opioids in Cuyahoga or Summit Counties in Ohio at ABDCMDL00279836-ABDCMDL00279838 (2012-2018: Cuyahoga County, Summit County, City of Cleveland); ABDCMDL00279840-ABDCMDL00279841 (2007-2012: Summit County); ABDCMDL00279843-ABDCMDL00279844 (2007-2012: Cuyahoga County); ABDCMDL00279846-ABDCMDL00279847 (2007-2012: City of Cleveland); ABDCMDL00308068-ABDCMDL00308070 (2007-2012: Cuyahoga County, Summit County, City of Cleveland); ABDCMDL00355865 (April 2018-May 2018: Cuyahoga County, Summit

County, City of Cleveland). After a reasonable investigation, ABDC has not located documents that reflect its Order Monitoring Program data prior to July 1, 2007.

**Request No. 6.** For each suspicious order your reported to the DEA since January 1, 2006, please identify whether you declined the order or *shipped* the order and produce all documents related thereto; please identify the Bates stamp range for each related to *Case Track One*.

**RESPONSE:**

ABDC incorporates herein by reference its General Objections and Objections to Definitions and Instructions as set forth in its Objections and Responses to Plaintiffs' Combined Discovery Requests. ABDC further objects to this Request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of information or documents relevant to any claim or defense in this action to the extent that it is not limited to ABDC's distribution of Opioids to Cuyahoga or Summit Counties in Ohio, or, more specifically, ABDC's distribution of Opioids to pharmacies or healthcare providers in Summit or Cuyahoga Counties in Ohio that are alleged to have actually diverted Opioids resulting in purported harm to Plaintiffs. ABDC further objects to this Combined Request to the extent it implies that an order flagged by ABDC's Order Monitoring Program is a "suspicious order." To the contrary, once an order is flagged by ABDC's Order Monitoring Program for further review, it is further reviewed to determine whether it is "suspicious." ABDC further objects to this Request to the extent it suggests that there is a "Shipping Requirement" in the relevant federal regulations.

Subject to and without waiving its objections, ABDC states that after reasonable investigation, for the period from July 1, 2007 to May 29, 2018, it is not aware of any orders determined to be suspicious that were shipped to a customer. By way of further response, ABDC has produced Documents sufficient to identify the action taken for orders flagged by ABDC's

Order Monitoring Program for further review from July 1, 2007 to May 29, 2018, relating to its distribution and sale of Opioids in Cuyahoga or Summit Counties in Ohio at ABDCMDL00279836-ABDCMDL00279838 (2012-2018: Cuyahoga County, Summit County, City of Cleveland); ABDCMDL00279840-ABDCMDL00279841 (2007-2012: Summit County); ABDCMDL00279843-ABDCMDL00279844 (2007-2012: Cuyahoga County); ABDCMDL00279846-ABDCMDL00279847 (2007-2012: City of Cleveland); ABDCMDL00308068-ABDCMDL00308070 (2007-2012: Cuyahoga County, Summit County, City of Cleveland); ABDCMDL00355865 (April 2018-May 2018: Cuyahoga County, Summit County, City of Cleveland). After a reasonable investigation, ABDC has not located documents that reflect its Order Monitoring Program data prior to July 1, 2007.

**Request No. 7.** For each suspicious order you reported and then shipped since January 1, 2006, please produce all documents related to your "*due diligence*" for each; please identify the Bates stamp range for each related to *Case Track One*.

**RESPONSE:**

ABDC incorporates herein by reference its General Objections and Objections to Definitions and Instructions as set forth in its Objections and Responses to Plaintiffs' Combined Discovery Requests. ABDC further objects to this Request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of information or documents relevant to any claim or defense in this action to the extent that it is not limited to ABDC's distribution of Opioids to Cuyahoga or Summit Counties in Ohio, or, more specifically, ABDC's distribution of Opioids to pharmacies or healthcare providers in Summit or Cuyahoga Counties in Ohio that are alleged to have actually diverted Opioids resulting in purported harm to Plaintiffs. ABDC further objects to this Request to the extent it suggests that there is a "Shipping Requirement" in the relevant federal regulations.

Subject to and without waiving its objections, ABDC incorporates by references its response to Combined Discovery Request No. 6. After a reasonable investigation, ABDC has not located documents that reflect its Order Monitoring Program data prior to July 1, 2007. ABDC further states that after reasonable investigation, for the period from July 1, 2007 to May 29, 2018, it is not aware of any orders identified as suspicious that were shipped to a customer.

Dated: November 30, 2018

Respectfully submitted,

/s Robert A. Nicholas

Robert A. Nicholas

Shannon E. McClure

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**CERTIFICATE OF SERVICE**

I hereby certify that on November 30, 2018, the foregoing was sent by electronic mail to Counsel for the Plaintiffs and Defendants as follows:

***Plaintiffs' Designated Distribution List:***

mdl2804discovery@motleyrice.com

***Defendants' Designated Distribution List:***

xALLDEFENDANTS-MDL2804-Service@arnoldporter.com

/s Robert A. Nicholas

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## MDL 2804 AmerisourceBergen Drug Corporation ("ABDC") Document Productions

| ABDC MDL Volume Number | Beginning MDL Bates Number | Ending MDL Bates Number | Description  | Produced |
|------------------------|----------------------------|-------------------------|--|----------|
| ABDCMDL_VOL001         | ABDCMDL00000001            | ABDCMDL00002155         | Prior Production: Multistate Attorneys General   | 6/1/2018 |
| ABDCMDL_VOL002         | ABDCMDL00002156            | ABDCMDL00002248         | Prior Production: New Hampshire Attorney General   | 6/1/2018 |
| ABDCMDL_VOL003         | ABDCMDL00002249            | ABDCMDL00002256         | Prior Production: Mississippi Board of Pharmacy  | 6/1/2018 |
| ABDCMDL_VOL004         | ABDCMDL00002257            | ABDCMDL00002260         | Prior Production: Mississippi Attorney General   | 6/1/2018 |
| ABDCMDL_VOL005         | ABDCMDL00002261            | ABDCMDL00002639         | Prior Production: New Jersey Attorney General  | 6/1/2018 |
| ABDCMDL_VOL006         | ABDCMDL00002640            | ABDCMDL00003219         | Prior Production: Indiana Attorney General   | 6/1/2018 |
| ABDCMDL_VOL007         | ABDCMDL00003220            | ABDCMDL00003366         | Prior Production: Lake County, IL State's Attorney's Office                                    | 6/1/2018 |
| ABDCMDL_VOL008         | ABDCMDL00003367            | ABDCMDL00003746         | Prior Production: Alaska Attorney General  | 6/1/2018 |
| ABDCMDL_VOL009         | ABDCMDL00003747            | ABDCMDL00003748         | Prior Production: United States Senate Committee on Homeland Security and Governmental Affairs | 6/1/2018 |
| ABDCMDL_VOL010         | ABDCMDL00003749            | ABDCMDL00004230         | Prior Production: United States House of Representatives Committee on Energy and Commerce      | 6/1/2018 |

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| ABDC MDL Volume Number | Beginning MDL Bates Number | Ending MDL Bates Number | Description  | Produced  |
|------------------------|----------------------------|-------------------------|--|-----------|
| ABDCMDL_VOL011         | ABDCMDL00004231            | ABDCMDL00005106         | Prior Production: South Carolina Attorney General  | 6/11/2018 |
| ABDCMDL_VOL012         | ABDCMDL00005107            | ABDCMDL00017003         | Prior Production: DOJ and DEA Subpoena from District of New Jersey   | 6/11/2018 |
| ABDCMDL_VOL013         | ABDCMDL00017004            | ABDCMDL00035365         | Prior Production: DOJ and DEA Subpoena from Denver, CO Field Office  | 6/11/2018 |
| ABDCMDL_VOL014         | ABDCMDL00035366            | ABDCMDL00037251         | Prior Production: <i>State of West Virginia ex rel. v. AmerisourceBergen Drug Corporation, et al.</i> , No. 12-C-141 (W. Va. Cir. Ct. – Boone Cnty.) | 6/11/2018 |
| ABDCMDL_VOL015         | ABDCMDL00037252            | ABDCMDL00037315         | Prior Production: Multistate Attorneys General   | 6/11/2018 |
| ABDCMDL_VOL016         | ABDCMDL00037316            | ABDCMDL00037401         | Prior Production: DOJ and DEA Subpoena from Northern District of West Virginia   | 6/11/2018 |
| ABDCMDL_VOL017         | ABDCMDL00037402            | ABDCMDL00037418         | Documents responsive to MDL Plaintiffs' Requests for Production Nos. 32-33 and Interrogatory No. 3   | 6/11/2018 |
| ABDCMDL_VOL018         | ABDCMDL00037419            | ABDCMDL00037427         | Prior Production: Privilege logs produced in connection with documents productions responsive to Paragraph 9(k)(ii) of MDL CMO No. 1                 | 6/11/2018 |

## MDL 2804 AmerisourceBergen Drug Corporation ("ABDC") Document Productions

| ABDC MDL Volume Number | Beginning MDL Bates Number | Ending MDL Bates Number | Description   | Produced  |
|------------------------|----------------------------|-------------------------|---|-----------|
| ABDCMDL_VOL019         | ABDCMDL00037428            | ABDCMDL00043354         | Insurance agreements and insurance coverage charts  | 6/14/2018 |
| ABDCMDL_VOL020         | ABDCMDL00043355            | ABDCMDL00044996         | Documents responsive to MDL Plaintiffs' Requests for Production and Interrogatories   | 7/3/2018  |
| ABDCMDL_VOL021         | ABDCMDL00044997            | ABDCMDL00047016         | Distribution agreements between ABDC and pharmaceutical manufacturers; Transactional, Order Monitoring Program, and Suspicious Order Reporting data for the State of Ohio for 2007-2017; Deposition transcripts and exhibits from <i>State of West Virginia ex rel. v. AmerisourceBergen Drug Corporation, et al.</i> , No. 12-C-141 (W. Va. Cir. Ct. – Boone Cnty.). | 7/13/2018 |
| ABDCMDL_VOL022         | ABDCMDL00047017            | ABDCMDL00155325         | Custodial files from Eric Cherveney   | 7/20/2018 |
| ABDCMDL_VOL023         | ABDCMDL00155326            | ABDCMDL00169849         | Custodial files from David May  | 7/20/2018 |
| ABDCMDL_VOL024         | ABDCMDL00169850            | ABDCMDL00172134         | ABDC Annual Plans; Track One Customer Order Monitoring Program Thresholds; Industry Group Payment Information; Files collected from Corporate Security and Regulatory Affairs Share Drive   | 7/20/2018 |
| ABDCMDL_VOL025         | ABDCMDL00172135            | ABDCMDL00248588         | Custodial files from Eric Cherveney   | 7/27/2018 |
| ABDCMDL_VOL026         | ABDCMDL00248589            | ABDCMDL00264103         | Custodial files from David May  | 7/27/2018 |



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| ABDC MDL Volume Number  | Beginning MDL Bates Number | Ending MDL Bates Number | Description  | Produced  |
|---|----------------------------|-------------------------|--|-----------|
| ABDCMDL_VOL027  | ABDCMDL00264104            | ABDCMDL00279650         | Custodial files from Chris Zimmerman   | 7/27/2018 |
| ABDCMDL_VOL028  | ABDCMDL00279651            | ABDCMDL00279853         | Suspicious Order Reports to Ohio BOP; Track One Customer Order Monitoring Program Thresholds; Transactional, Order Monitoring Program, and Suspicious Order Reporting data for Track One Customers | 7/27/2018 |
| ABDCMDL_VOL024a   | ABDCMDL00169888            | ABDCMDL00169888         | Replacement copy of native file spreadsheet containing errant "Privileged & Confidential – Attorney Client Work Product" footer  | 7/30/2018 |
| ABDCMDL_VOL029  | ABDCMDL00279854            | ABDCMDL00279865         | Settlement and Release Agreement entered into between DEA and ABDC   | 7/30/2018 |
| ABDCMDL_VOL023_Clawback;<br>ABDCMDL_VOL025_Clawback;<br>ABDCMDL_VOL030  | ABDCMDL00279866            | ABDCMDL00279884         | Claw back and reproduction of documents pursuant to August 2, 2018 letter  | 8/2/2018  |
| ABDCMDL_VOL_Clawback24;<br>ABDCMDL_VOL_Clawback26;<br>ABDCMDL_VOL_Clawback27;<br>ABDCMDL_VOL031                   | ABDCMDL00279885            | ABDCMDL00280022         | Claw back and reproduction of documents pursuant to August 3, 2018 letter  | 8/4/2018  |
| ABDCMDL_VOL026_CLAWBACK;<br>ABDCMDL_VOL027_CLAWBACK;<br>ABDCMDL_VOL027_OVERLAY_<br>CLAWBACKS_2;<br>ABDCMDL_VOL032 | ABDCMDL00280023            | ABDCMDL00280046         | Claw back and reproduction of documents pursuant to August 10, 2018 letter   | 8/14/2018 |

## MDL 2804 AmerisourceBergen Drug Corporation ("ABDC") Document Productions

| ABDC MDL Volume Number | Beginning MDL Bates Number | Ending MDL Bates Number | Description   | Produced  |
|------------------------|----------------------------|-------------------------|---|-----------|
| ABDCMDL_VOL033         | ABDCMDL00280047            | ABDCMDL00280635         | Track One Customer Due Diligence Files;<br>Track One Customer Prime Vendor Agreements                               | 8/14/2018 |
| ABDCMDL_VOL034         | ABDCMDL00280636            | ABDCMDL00281093         | Custodial files from Ed Hazewski  | 8/17/2018 |
| ABDCMDL_VOL035         | ABDCMDL00281094            | ABDCMDL00281211         | Custodial files from Eric Cherveney   | 8/17/2018 |
| ABDCMDL_VOL036         | ABDCMDL00281212            | ABDCMDL00281307         | Files collected from Corporate Security and Regulatory Affairs Share Drive  | 8/17/2018 |
| ABDCMDL_VOL037         | ABDCMDL00281308            | ABDCMDL00282047         | Track One Customer Due Diligence Files  | 8/17/2018 |
| ABDCMDL_VOL038         | ABDCMDL00282048            | ABDCMDL00282071         | Track One Customer Due Diligence Files  | 8/24/2018 |
| ABDCMDL_VOL039         | ABDCMDL00282072            | ABDCMDL00282757         | Custodial files from Ed Hazewski  | 8/24/2018 |
| ABDCMDL_VOL040         | ABDCMDL00282758            | ABDCMDL00285562         | Custodial files from Steve Mays   | 8/24/2018 |
| ABDCMDL_VOL041         | ABDCMDL00285563            | ABDCMDL00287855         | Custodial files from Ed Hazewski  | 8/31/2018 |
| ABDCMDL_VOL042         | ABDCMDL00287856            | ABDCMDL00289536         | Custodial files from Steve Mays   | 8/31/2018 |
| ABDCMDL_VOL043         | ABDCMDL00289537            | ABDCMDL00291162         | Custodial files from Sharon Hartman   | 8/31/2018 |
| ABDCMDL_VOL044         | ABDCMDL00291163            | ABDCMDL00295167         | Custodial files from Steve Mays   | 9/7/2018  |
| ABDCMDL_VOL045         | ABDCMDL00295168            | ABDCMDL00295613         | Custodial files from Sharon Hartman   | 9/7/2018  |
| ABDCMDL_VOL046         | ABDCMDL00295614            | ABDCMDL00298458         | Custodial files from Elizabeth Garcia   | 9/7/2018  |
| ABDCMDL_VOL048         | ABDCMDL00298788            | ABDCMDL00300250         | Custodial files from Emily Coldren  | 9/20/2018 |
| ABDCMDL_VOL049         | ABDCMDL00300251            | ABDCMDL00301209         | Custodial files from Steve Mays   | 9/20/2018 |
| ABDCMDL_VOL050         | ABDCMDL00301210            | ABDCMDL00302542         | Files collected from Corporate Security and Regulatory Affairs Share Drive; 2006 Cuyahoga County transactional data | 9/21/2018 |
| ABDCMDL_VOL051         | ABDCMDL00302543            | ABDCMDL00304902         | Custodial files from Kevin Kreutzer   | 9/21/2018 |

## MDL 2804 AmerisourceBergen Drug Corporation ("ABDC") Document Productions

| ABDC MDL Volume Number  | Beginning MDL Bates Number | Ending MDL Bates Number | Description   | Produced   |
|---|----------------------------|-------------------------|---|------------|
| ABDCMDL_VOL022_Clawback;<br>ABDCMDL_VOL023_Clawback02;<br>ABDCMDL_VOL024_Clawback02;<br>ABDCMDL_VOL025_Clawback02;<br>ABDCMDL_VOL026_Clawback03 | ABDCMDL00298653            | ABDCMDL00298787         | Claw back and reproduction of documents pursuant to September 25, 2018 letter     | 9/25/2018  |
| ABDCMDL_VOL052  | ABDCMDL00304903            | ABDCMDL00306357         | Custodial files from Eric Cherveny  | 9/27/2018  |
| ABDCMDL_VOL034R   | ABDCMDL00280636            | ABDCMDL00281093         | Replacement production of ABDCMDL_VOL034 originally produced on August 17, 2018   | 9/27/2018  |
| ABDCMDL_VOL053  | ABDCMDL00306358            | ABDCMDL00306727         | Custodial files from Ed Hazewski  | 9/28/2018  |
| ABDCMDL_VOL054  | ABDCMDL00306728            | ABDCMDL00306729         | 2005 Cuyahoga County transactional data<br>2006 Summit County transactional data  | 9/28/2018  |
| ABDCMDL_VOL055  | ABDCMDL00306730            | ABDCMDL00308067         | Custodial files from Steve Mays   | 10/5/2018  |
| ABDCMDL_VOL056  | ABDCMDL00308068            | ABDCMDL00308071         | 2005 Summit County transactional data;<br>Additional CSRA Reports from Legacy OMP | 10/5/2018  |
| ABDCMDL_VOL057  | ABDCMDL00308072            | ABDCMDL00313547         | Custodial files from Steve Mays   | 10/10/2018 |
| ABDCMDL_VOL058  | ABDCMDL00313548            | ABDCMDL00313652         | Custodial files from Eric Cherveny  | 10/11/2018 |
| ABDCMDL_VOL059  | ABDCMDL00313653            | ABDCMDL00313654         | 2004 Cuyahoga and Summit County transactional data                                | 10/12/2018 |
| ABDCMDL_VOL060  | ABDCMDL00313655            | ABDCMDL00315005         | Custodial files from Bruce Gundy  | 10/22/2018 |
| ABDCMDL_VOL061  | ABDCMDL00315006            | ABDCMDL00315782         | Custodial files from Nikki Seckinger  | 10/22/2018 |
| ABDCMDL_VOL062  | ABDCMDL00315783            | ABDCMDL00316110         | Hard copy documents reflecting communications with the DEA                        | 10/23/2018 |
| ABDCMDL_VOL063  | ABDCMDL00316111            | ABDCMDL00316114         | June 1, 2002 to December 31, 2003 Cuyahoga and Summit County transactional data   | 10/23/2018 |
| ABDCMDL_VOL064  | ABDCMDL00316115            | ABDCMDL00316680         | Custodial files from David May  | 10/24/2018 |
| ABDCMDL_VOL065  | ABDCMDL00316681            | ABDCMDL00316952         | Custodial files from Chris Zimmerman  | 10/24/2018 |
| ABDCMDL_VOL066  | ABDCMDL00316953            | ABDCMDL00317472         | Custodial files from Elizabeth Garcia   | 10/24/2018 |
| ABDCMDL_VOL067  | ABDCMDL00317473            | ABDCMDL00317898         | Custodial files from Kevin Kreutzer   | 10/24/2018 |

## MDL 2804 AmerisourceBergen Drug Corporation (“ABDC”) Document Productions

| ABDC MDL Volume Number | Beginning MDL Bates Number | Ending MDL Bates Number | Description                              | Produced   |
|------------------------|----------------------------|-------------------------|--|------------|
| ABDCMDL VOL068         | ABDCMDL00317899            | ABDCMDL00318209         | Custodial files from Emily Coldren       | 10/24/2018 |
| ABDCMDL VOL069         | ABDCMDL00318210            | ABDCMDL00318356         | Custodial files from Sharon Hartman      | 10/25/2018 |
| ABDCMDL VOL070         | ABDCMDL00318357            | ABDCMDL00318377         | Custodial files from Teresa Javier       | 10/25/2018 |
| ABDCMDL VOL071         | ABDCMDL00318378            | ABDCMDL00318830         | Custodial files from Nathan Elkins       | 10/25/2018 |
| ABDCMDL VOL072         | ABDCMDL00318831            | ABDCMDL00319191         | Custodial files from Damacio Rodriguez   | 10/25/2018 |
| ABDCMDL VOL073         | ABDCMDL00319192            | ABDCMDL00319262         | Custodial files from Gabriel Weissman    | 10/25/2018 |
| ABDCMDL VOL074         | ABDCMDL00319263            | ABDCMDL00319410         | Custodial files from Amy Illig           | 10/25/2018 |
| ABDCMDL VOL075         | ABDCMDL00319411            | ABDCMDL00319585         | Custodial files from Kayla Kessler       | 10/25/2018 |
| ABDCMDL VOL076         | ABDCMDL00319586            | ABDCMDL00319720         | Custodial files from Connor Nell         | 10/25/2018 |
| ABDCMDL VOL077         | ABDCMDL00319721            | ABDCMDL00320231         | Custodial files from Celia Weber         | 10/25/2018 |
| ABDCMDL VOL078         | ABDCMDL00320232            | ABDCMDL00320238         | Custodial files from Valerie Johnson     | 10/25/2018 |
| ABDCMDL VOL079         | ABDCMDL00320239            | ABDCMDL00322576         | Custodial files from Rita Norton         | 10/25/2018 |
| ABDCMDL VOL080         | ABDCMDL00322577            | ABDCMDL00322856         | Custodial files from Kristen Perkins     | 10/25/2018 |
| ABDCMDL VOL081         | ABDCMDL00322857            | ABDCMDL00322977         | Custodial files from David Breitmayer    | 10/25/2018 |
| ABDCMDL VOL082         | ABDCMDL00322978            | ABDCMDL00323468         | Custodial files from Mathew Hurless      | 10/25/2018 |
| ABDCMDL VOL083         | ABDCMDL00323469            | ABDCMDL00323618         | Custodial files from James Schuster      | 10/25/2018 |
| ABDCMDL VOL084         | ABDCMDL00323619            | ABDCMDL00323656         | Custodial files from Hillary Knepper     | 10/26/2018 |
| ABDCMDL VOL085         | ABDCMDL00323657            | ABDCMDL00323822         | Custodial files from John Bryant         | 10/26/2018 |
| ABDCMDL VOL086         | ABDCMDL00323823            | ABDCMDL00323864         | Custodial files from Ashley Moore        | 10/26/2018 |
| ABDCMDL VOL087         | ABDCMDL00323865            | ABDCMDL00325800         | Custodial files from Lisa Bowes          | 10/26/2018 |
| ABDCMDL VOL088         | ABDCMDL00325801            | ABDCMDL00325940         | Custodial files from Julie Hinman (Papa) | 10/26/2018 |
| ABDCMDL VOL089         | ABDCMDL00325941            | ABDCMDL00326923         | Custodial files from Tennille Ashworth   | 10/26/2018 |
| ABDCMDL VOL090         | ABDCMDL00326924            | ABDCMDL00327687         | Custodial files from Ronald Kline        | 10/26/2018 |
| ABDCMDL VOL091         | ABDCMDL00327688            | ABDCMDL00329092         | Custodial files from Jill Jackson        | 10/26/2018 |
| ABDCMDL VOL092         | ABDCMDL00329093            | ABDCMDL00331090         | Custodial files from Sarah Read          | 10/26/2018 |
| ABDCMDL VOL093         | ABDCMDL00331091            | ABDCMDL00336745         | Custodial files from Joseph Tomkiewicz   | 10/26/2018 |
| ABDCMDL VOL094         | ABDCMDL00336746            | ABDCMDL00337410         | Custodial files from Carol Sherman-Hynes | 10/26/2018 |
| ABDCMDL VOL095         | ABDCMDL00337411            | ABDCMDL00343514         | Custodial files from Carli Kissling      | 10/26/2018 |
| ABDCMDL VOL096         | ABDCMDL00343515            | ABDCMDL00352181         | Custodial files from Gregory Hamilton    | 10/26/2018 |
| ABDCMDL VOL097         | ABDCMDL00352182            | ABDCMDL00355513         | Custodial files from Marcelino Guerreiro | 10/26/2018 |

## MDL 2804 AmerisourceBergen Drug Corporation (“ABDC”) Document Productions

| ABDC MDL Volume Number | Beginning MDL Bates Number | Ending MDL Bates Number | Description  | Produced   |
|------------------------|----------------------------|-------------------------|--|------------|
| ABDCMDL_VOL098         | ABDCMDL00355514            | ABDCMDL00355516         | April 17-18, 2018 to May 29, 2018 City of Cleveland, Cuyahoga County, and Summit County transactional data         | 10/31/2018 |
| ABDCMDL_VOL099         | ABDCMDL00355517            | ABDCMDL00355864         | Files collected from the Corporate Security and Regulatory Affairs Share Drive                                     | 11/2/2018  |
| ABDCMDL_VOL100         | ABDCMDL00355865            | ABDCMDL00355865         | April 18, 2018 to May 29, 2018 City of Cleveland, Cuyahoga County, and Summit County Order Monitoring Program data | 11/2/2018  |
| ABDCMDL_VOL101         | ABDCMDL00355866            | ABDCMDL00357737         | Custodial files from Michael Bramowski   | 11/5/2018  |
| ABDCMDL_VOL102         | ABDCMDL00357738            | ABDCMDL00358082         | Custodial files from Patrick Lazaro  | 11/5/2018  |
| ABDCMDL_VOL103         | ABDCMDL00358083            | ABDCMDL00359841         | Custodial files from Brad Tallamy  | 11/5/2018  |
| ABDCMDL_VOL104         | ABDCMDL00359842            | ABDCMDL00360337         | Files collected from the Corporate Security and Regulatory Affairs Share Drive                                     | 11/6/2018  |
| ABDCMDL_VOL105         | ABDCMDL00360338            | ABDCMDL00360352         | Custodial files from Eric Cherveney previously withheld as part of ABDC's privilege review                         | 11/8/2018  |
| ABDCMDL_VOL106         | ABDCMDL00360353            | ABDCMDL00360356         | Custodial files from Ed Hazewski previously withheld as part of ABDC's privilege review                            | 11/8/2018  |
| ABDCMDL_VOL107         | ABDCMDL00360357            | ABDCMDL00360396         | Track One Customer Due Diligence Files   | 11/9/2018  |
| ABDCMDL_VOL108         | ABDCMDL00360397            | ABDCMDL00360399         | Custodial files from Amy Illig previously withheld as part of ABDC's privilege review                              | 11/9/2018  |
| ABDCMDL_VOL110         | ABDCMDL00360404            | ABDCMDL00362039         | Custodial files collected from Sharon Hartman's hard drive   | 11/15/2018 |
| ABDCMDL_VOL109         | ABDCMDL00360400            | ABDCMDL00360403         | Tableau Files utilized by ABDC's Diversion Control Team  | 11/16/2018 |
| ABDCMDL_VOL111         | ABDCMDL00362040            | ABDCMDL00364205         | Custodial files from Paul Ross   | 11/16/2018 |
| ABDCMDL_VOL112         | ABDCMDL00364206            | ABDCMDL00364266         | Files collected from the Corporate Security and Regulatory Affairs Share Drive                                     | 11/16/2018 |
| ABDCMDL_VOL113         | ABDCMDL00364267            | ABDCMDL00364390         | Files collected from the Corporate Security and Regulatory Affairs Share Drive                                     | 11/28/2018 |

## MDL 2804 AmerisourceBergen Drug Corporation (“ABDC”) Document Productions

| ABDC MDL Volume Number | Beginning MDL Bates Number | Ending MDL Bates Number | Description   | Produced   |
|------------------------|----------------------------|-------------------------|---|------------|
| ABDCMDL_VOL114         | ABDCMDL00364391            | ABDCMDL00364395         | Document from custodial file of Kevin Kreutzer inadvertently withheld from prior production | 11/28/2018 |
| ABDCMDL_VOL115         | ABDCMDL00364396            | ABDCMDL00364399         | Tableau Files utilized by ABDC’s Diversion Control Team                                     | 11/29/2018 |